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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:
<b>Debtors.</b>	:
	x

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**NOTICE OF WITHDRAWAL OF DEBTORS' SECOND MOTION IN AID  
OF ALTERNATIVE DISPUTE RESOLUTION PROCEDURES ORDER FOR  
INDEMNIFICATION CLAIMS OF THE DEBTORS AGAINST MORTGAGE  
LOAN SELLERS AS TO TARGETRATE.COM**

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**PLEASE TAKE NOTICE** that on April 22, 2016, Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator for the entities in the above referenced chapter 11 cases (the “Debtors”), filed a second motion in aid of alternative dispute resolution procedures order for indemnification claims of the Debtors against mortgage loan sellers (the “Motion”) [Dkt. No. 52574].

**PLEASE TAKE FURTHER NOTICE** that on May 3, 2016, TargetRate.com (“TargetRate”) filed an objection to the Motion (the “Objection”) [Dkt. No. 52690].

**PLEASE TAKE FURTHER NOTICE** that on May 12, 2016, the Court entered an Order granting the Motion, but adjourning the hearing date for the Motion as to certain parties

that filed a response or objection, including TargetRate, until June 2, 2016 [Dkt. No. 52756]. The Motion was further adjourned as to certain parties, including TargetRate, until September 20, 2016.

**PLEASE TAKE FURTHER NOTICE** that LBHI is hereby withdrawing the Motion as to TargetRate. This withdrawal shall only apply to TargetRate, is without prejudice, and shall not have any force or effect as to any other entity subject to the Motion.

Dated: New York, New York  
September 14, 2016

/s/ Adam M. Bialek

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